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Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

No. 3:16-cr-000510-BR

Plaintiff,

v.

**Ammon Bundy, et al.,**

Defendants.

Pursuant to the Court's April 11, 2016, Order (ECF No. 389) and its April 15, 2016, Order (ECF No. 422), attorneys for the Defendant's Discovery Committee have conferred with the Government. The parties offer the following:

On Monday, May 2, 2016, the government produced hard drives with four volumes of discovery (Volume 12-15, the previous 11 Volumes had been provided to defense counsel). The four volumes included 793GB of data in 160,840 files. There were 4,527 Bates numbers. This production included evidence items and FBI reports.

The Government expects the next production to be available to the defense on Friday or Monday. It will contain additional FBI reports and evidence items and will be in excess of 500GB.

Mr. Blomgren, represented by Robert Rainwater, has received the first 15 Volumes of discovery from the government. Ms. Wood for Mr. Ritzheimer is still awaiting delivery of Volumes 12 through 15 by FedEx. All defense counsel will have access to the discovery services of DTI on Wednesday of next week, the 11<sup>th</sup> of May.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> of May, 2016.

s/ Robert W. Rainwater  
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